



**NOTICE OF PREPARATION AND SCOPING MEETING
RAMONA GATEWAY COMMERCE CENTER PROJECT
Draft Environmental Impact Report**

March 24, 2022

To:
(Potential Responsible, Trustee,
Federal and Local Agencies, and nearby
Property owners)

From:
City of Perris
135 North "D" Street
Perris CA, 92570

CEQA LEAD AGENCY:

City of Perris
Planning Division
135 North "D" Street
Perris, CA 92570
(951) 943-5003 ext. 115
Contact: Mathew Evans, Project Planner

SUBJECT: Ramona Gateway Commerce Center Project

- Conditional Use Permit (CUP) (Case No. PLN21-05216) for Retail Uses
- Development Plan Review (DPR) (Case No. DPR21-00013) for the Proposed Warehouse
- Specific Plan Amendment (SPA) (Case No. PLN21-05218) for the Proposed Warehouse
- Tentative Parcel Map (TPM) No. 38292 (Case No. PLN21-05219)
- Street Vacation (Dawes Street (Case No. PLN21-05220)
- Environmental Impact Report (Case No. PLN21-05217)

The City of Perris is commencing preparation of a Draft Environmental Impact Report (EIR) for the Ramona Gateway Commerce Center Project (referred to herein as the Project), and has released this Notice of Preparation (NOP) per the requirements of the California Environmental Quality Act (CEQA). The City wants to know the views of your agency as to the scope and content of the environmental information germane to your agency's statutory responsibilities. As a responsible or trustee agency, your agency may need to use the environmental impact report (EIR) prepared by the City when considering issuance of a permit or other approval for the Project. Information gathered during the NOP comment period will be used to shape and focus future analyses of potential environmental impacts.

A description of the Project, its location, and potential environmental effects, is attached. The City of Perris has determined that an EIR is required and no Initial Study will be prepared (see State CEQA Guidelines, Sections 15060 and 15081).

NOP COMMENT PERIOD:

The City invites you to submit written comments describing your specific environmental concerns. If you are representing a public agency, please identify your specific areas of statutory responsibility, if applicable. Written comments are desired at the earliest possible date, but due to the time limits mandated by State law, your response must be sent no later than 30 days after receipt of this notice. **The NOP public comment period begins on March 30, 2022 and ends on April 29, 2022. A public scoping meeting is scheduled for 6:00 p.m., on April 20, 2022 in the City Council Chambers of the City of Perris, 101 North "D" Street.** Please send your written comments to the City staff contact identified above, and please include your name, address, and contact information in your correspondence.

Project Title: Ramona Gateway Commerce Center Project

Project Applicant: Mr. Daniel Sachs
PERRIS LANDCO LLC
3130 20th Street, Suite 290
San Francisco, CA 94110

Date: March 24, 2022

Signature:


Mathew Evans, Project Planner

I. PROJECT SITE LOCATION AND SETTING

The approximately 50-gross-acre¹ Ramona Gateway Commerce Center Project (Project) site is generally located south of Ramona Expressway, west of Webster Avenue, east of Nevada Avenue, and north of Val Verde High School, in the City of Perris, Riverside County. The regional and local vicinity of the Project area are shown in Figure 1 (attached at the end of this NOP). The Project site is within the boundaries of the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area. The existing General Plan land use designation and zoning for the Project site is Specific Plan (i.e., the PVCCSP) (City of Perris, 2021a). The southern portion of the Project site is designated for Business Professional Office uses and the northern portion of the Project site is designated for Commercial uses in the PVCCSP (City of Perris, 2021b).

As shown on the aerial photograph provided in Figure 2, the Project site consists of undeveloped land that has been subject to a variety of anthropogenic disturbances associated with historic agricultural activities, surrounding development, and routine weed abatement/disking activities. The Project site is relatively flat with elevations ranging from approximately 1,479 to 1,495 feet above mean sea level. The previous site disturbances have eliminated the natural plant communities that historically occurred on the Project site and no native plant communities occur onsite. The Project site supports one plant community (non-native grassland) and the remaining land cover type is classified as disturbed. One ephemeral water feature occurs onsite and originates at Nevada Avenue in the middle of the western boundary of the Project site. The stormwater run-on originates from properties west of the Project site and before that, from a culvert beneath I-215. Once onsite, these ephemeral feature traverses the site from west to east toward the eastern boundary of the site, where there are three storm drain inlets along eastern boundary of the site. The onsite feature dissipates/infiltrates onsite and does not present a surface hydrologic connection to any downstream waters. Therefore, the onsite feature would not qualify as jurisdictional by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, or California Department of Fish and Wildlife.

The Project site is located within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project site is not located within any MSHCP Criteria Cell or designated conservation area, Core or Linkage area, Mammal Survey Area, Amphibian Survey Area, Criteria Area Species Survey Area, Narrow Endemic Plant Species Survey Area, or Burrowing Owl Survey Area. Additionally, the onsite ephemeral water feature would not qualify as riparian/riverine habitat under the MSHCP.

The Project site is located approximately 1.2 miles south of the March Air Reserve Base/Inland Port Airport (MARB/IPA), is within the Airport Influence Area, and is within the City's Airport Overlay Zone. Specifically, the Project site is within the Outer Horizontal Surface and Approach/Departure Clearance Surface of the Federal Aviation Regulations (FAR), Part 77 (Imaginary Surfaces), and Compatibility Zone C1 (Primary Approach/Departure Zone) of the 2014 MARB/IPA Land Use Compatibility Plan (ALUCP).

The area adjacent to and south of the Project site has a Public/Semi-Public land use designation in the PVCCSP and is developed with Val Verde High School, Val Verde Academy, and the Val Verde Regional Learning Center. The area to the north of the Project site (north of Ramona Expressway) has Commercial and Light Industrial PVCCSP land use designations. The area adjacent to and immediately north of Ramona Expressway (with a Commercial land use designation) remains undeveloped but is planned for a previously approved retail

¹ The Project site is 49.97 gross acres and 49.17 net acres and includes Assessor Parcel Numbers (APNs) 317-120-021; 317-130-048, -025, -021, and -017.

development. There are existing industrial uses to the north of the undeveloped area. The area to the west of the Project site (west of Nevada Avenue) has Commercial and Potential Basin Area PVCCSP land use designations and is currently undeveloped. I-215 is located approximately 600 feet to the west of the Project site and forms the western boundary of the City of Perris and the PVCCSP planning area. The area to the east of the Project site (east of Webster Avenue) is currently undeveloped and has a Light Industrial PVCCSP land use designation. There are existing industrial uses further to the east.

II. PROJECT BACKGROUND

On January 10, 2012, the City of Perris City Council adopted the PVCCSP, which was prepared pursuant to the authority granted to the City by California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 to 65457. On the same date, the City also adopted Ordinance No. 1284, adopting Specific Plan Zoning for properties within the PVCCSP planning area. The PVCCSP land uses allow for the development of approximately 3,500 acres which consist of industrial, commercial, and office uses, as well as public facilities. The PVCCSP has been subsequently amended, with Amendment No. 12 occurring in January 2022. In conjunction with its approval of the PVCCSP, the City complied with CEQA by preparing and certifying the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report* (PVCCSP EIR) (State Clearinghouse No. 2009081086) (City of Perris, 2011).

III. PROJECT DESCRIPTION

The Project Applicant is requesting the discretionary approvals described below. Figure 3 presents the conceptual site plan for the proposed retail and warehouse uses. It is estimated that construction of the Project would be initiated in 2023 and would be completed by 2024.

1. Conditional Use Permit (CUP) for the Proposed Retail Development

The proposed commercial uses are consistent with the land use and zoning designations for the Project site; however, as required by the PVCCSP, the Project Applicant is requesting a “master” CUP for the proposed drive-thru restaurants and convenience store, described below. Specific retail tenants have not been identified; therefore, for purposes of analysis in the EIR, the proposed conceptual site plan represents the anticipated mix and site design for retail uses at the Project site. However, other retail uses may ultimately be contemplated, consistent with that allowed under the PVCCSP.

- **Buildings.** The retail component of the Project encompasses approximately 7.6 gross acres (7.0 net acres) along the south side of Ramona Expressway and based on the current conceptual site plan would include up to 37,215 square feet (sf) of retail uses in eight buildings including four drive-thru restaurants, two multi-tenant buildings (one with a drive-thru), a convenience store (with potential alcohol sales for off-site consumption), a gas station with a canopied fuel station, and a car wash.
- **Access, Circulation, and Parking.** Access to the proposed retail uses would be provided via driveways on Webster Avenue, Nevada Avenue, and Ramona Expressway. Stop-controlled driveways would be provided along both Nevada and Webster avenues. The Project Applicant’s proposed site plan includes two access points along Ramona Expressway; the western access along Ramona Expressway would be signalized, allowing for full access (no turn restrictions), and the eastern access would be stop-controlled. A signal would also be installed at the intersection of Nevada Avenue and Ramona Expressway. As directed by the City, access options are being evaluated in the EIR and supporting technical studies, as applicable, including elimination of the

eastern driveway along Ramona Expressway, and limiting turning movements at the other stop-controlled driveways. The Alternate Retail Access Site Plan without the eastern driveway along Ramona Expressway is also presented in Figure 3. On-site parking provided would exceed the City's parking requirements.

- **Offsite Improvements.** The Project would include site-adjacent roadway improvements. Ramona Expressway would be constructed to its ultimate half-width as an Expressway and would include the construction of a third eastbound through lane and other lane improvements along the south side of Ramona Expressway needed for site access (such as right-turn lanes and acceleration lanes). The addition of a third westbound lane along most of the north side of Ramona Expressway between Webster and Nevada Avenues is also proposed. Nevada Avenue would be constructed to its ultimate half-width as a Collector. Per direction from the City of Perris, a Class I multipurpose trail would be provided along Ramona Expressway (meandering), and Webster and Nevada avenues. Per input provided by the Riverside Transit Agency (RTA), a bus turnout would be provided along the south side of Ramona Expressway near the intersection with Webster Avenue.
- **Landscaping and Lighting.** Landscaped parkways would be provided along the adjacent roadways consistent with PVCCSP requirements; Ramona Expressway and Webster Avenue are designated as a Major Roadway Visual Corridors in the PVCCSP. A combination of landscaping and up to three-foot-high berms would be provided along Ramona Expressway to screen views of vehicles in drive-thru aisles. Landscaping would also be provided within the retail site, including parking areas for visual quality and shade. Onsite exterior lighting would be provided throughout the retail site as required for security and wayfinding.
- **Utilities.** The retail component of the Project would include the installation of on-site storm drain, water quality, water, sewer, electric, natural gas, and telecommunications infrastructure systems to serve the proposed retail uses. The onsite utility infrastructure would connect to existing utilities in the vicinity of the Project site or new utility lines that would be installed within the public right-of-way adjacent to the Project site. This would include a public 60-inch reinforced concrete pipe (RCP) that would eventually act as the ultimate outlet storm drain line from the future detention basin planned west of Nevada Avenue to the existing 60-inch storm drain on Webster Avenue. This facility would initially begin near the southern property border and run under Nevada Avenue, then east across the northly portion of the Project within a public access/maintenance easement designed to Riverside County Flood Control District standards.

2. Development Plan Review (DPR) for the Proposed Industrial Warehouse Building

The Project Applicant is requesting a DPR for the proposed construction and operation of the industrial warehouse building described below and shown on the conceptual site plan provided on Figure 3.

- **Warehouse Building.** The industrial component of the Project would include a 950,224-square-foot Class A high-cube warehouse building (including 20,000 sf of office space) on approximately 42.4 gross acres (42.2 net acres). The warehouse building would include 850,224 sf of ground floor building area and up to 100,000 sf of mezzanine area. The tenant is not known at this time; therefore, for purposes of analysis, it is assumed that 95 percent of the building square footage would be operated as a high-cube fulfillment center warehouse, 5 percent would be operated as a

high-cube cold storage warehouse, and the building could operate 24 hours a day, seven days a week.

The proposed building would be a cross-dock building with 124 loading dock positions (62 on both the east and west sides of the building) and four at-grade doors (for truck access or service access into the building) within enclosed/screened truck courts for truck trailer parking. The building would comply with applicable standards and guidelines outlined in the PVCCSP related to architecture and, in general, would have a modern industrial design. The building would have a maximum building height of 49 feet. Required indoor and outdoor employee amenities would also be provided.

- **Access, Circulation, and Parking.** Access would be provided from driveways along Webster and Nevada Avenues. Stop-controlled driveways near the southern property border on both Nevada and Webster Avenues exclusively for automobiles would provide access to the automobile parking area south of the warehouse building for employees and visitors entering/exiting the primary office area located in the southeast corner of the building. Two additional stop-controlled driveways would be provided along Nevada Avenue exclusively for truck access. The northern driveway would provide access to the east and west truck courts. The automobile parking area on the north side of the building is intended for use by delivery and maintenance van/vehicles. There would be no truck access to the southern automobile parking area (with the exception of emergency access vehicles). The separated auto and truck access is intended to prevent potential conflicts between trucks, automobiles, and pedestrians.

Onsite pedestrian pathways would connect to existing and proposed sidewalks along adjacent roadways and bicycle facilities would be provided onsite to encourage non-vehicular modes of transportation.

- **Offsite Improvements.** Nevada Avenue would be constructed to its ultimate half-width as a Collector, and site-adjacent roadway and streetscape improvements would be constructed along Nevada and Webster avenues, pursuant to the City's requirements. Class I multipurpose trails would be provided along Webster and Nevada avenues, which would seamlessly connect with the Class I multipurpose trails to be constructed as part of the proposed retail development.
- **Truck Routes.** Trucks traveling to/from the Project site would be required to access PVCCSP-designated truck routes. Directional signage would be provided onsite to direct drivers accordingly. Based on direction from the City and concurrence by the Val Verde School District, to access the nearest designated truck route, trucks would use Nevada Avenue, the Frontage Road, and Placentia Avenue, a PVCCSP designated truck route, to travel to and from I-215. The I-215/Placentia Avenue interchange is scheduled to be completed by 2022.
- **Landscaping, Walls/Fences, and Lighting.** Landscaped parkways would be provided along Webster and Nevada Avenues consistent with PVCCSP requirements; Webster Avenue is a designated as a Major Roadway Visual Corridor. To obstruct views from these roadways into the truck courts, there would be combinations of earthen berms and screen walls totaling 14 feet provided along Webster and Nevada avenues (up to eight feet of exposed walls as viewed from the street). Landscaping would also be provided along the entire site perimeter, within the automobile parking areas for visual quality and shading, and at select building-adjacent locations. In addition to landscaping provided in the southern parking lot, extensive landscaping would be provided along the southern property boundary to provide a buffer between the proposed building and school uses to the south. An eight-foot-high steel tubular fence would be provided along the boundary between

the proposed retail and industrial uses, and a six-foot-high steel tubular fence would extend along the onsite drainage channel. The existing fence along the southern property boundary would be retained with potential improvements to mitigate noise, as needed. Onsite exterior lighting would be provided throughout the industrial site as required for security and wayfinding.

- **Utilities:** The industrial component of the Project would also include the installation of on-site storm drain, water quality, water, sewer, electric, and telecommunications infrastructure systems to serve the proposed industrial use. The onsite utility infrastructure would connect to existing utilities in the vicinity of the Project site. In addition to storm drain infrastructure to accommodate storm water from the Project site, the Project would include the construction of a private overflow stormwater channel, which has been designed to capture any sheet flow runoff that exceeds the capacity of the proposed 60-inch RCP storm drain. This would be a trapezoidal channel, with a stilling basin at the downstream terminus of the channel.

3. Specific Plan Amendment for the Proposed Industrial Warehouse Building

The current General Plan land use designation and Zoning for the Project site is Specific Plan (i.e., the PVCCSP). The Project site has a PVCCSP land use designation of Commercial (northern portion of the Project site) and Business Professional Office (BPO) (southern portion of the Project). A Specific Plan Amendment is required for the proposed industrial use. Specifically, the following amendments to the PVCCSP (most recently amended in January 2022) are proposed.

- **Change (rezone) the PVCCSP land use designation** for 19.23 acres of BPO and 23.19 acres of Commercial to Light Industrial (LI) to facilitate development of the proposed 950,224 sf warehouse building.
- **Revise Figure 2.0-1, Specific Plan Land Use Designation**, to change the land use designations for the southern portion of the Project site (approximately 42.4 acres) from Commercial and BPO to Light Industrial (LI) as indicated above.
- **Revise Table 2.0-1, Land Use Comparison**, to update the acreage calculations for “Proposed Acres” as follows: reduce Commercial from 270 to 251 acres, reduce BPO from 271 to 248 acres, and increase LI from 2,033 to 2,075 acres.
- **Revise Figure 4.0-16, Residential Buffer**, to reflect the proposed changes in land use designations for the Project site as described above for Figure 2.0-1.
- **Revise Various PVCCSP figures to remove Dawes Street**, a “paper” street within the Project site that would be vacated as part the Project.

4. Tentative Parcel Map (TPM) No. 38292

The Project involves proposed TPM No. 38292 to re-subdivide the existing five-parcel Project site into seven parcels (six parcels for the proposed retail uses and one parcel for the proposed industrial use); and to vacate Dawes Street, which extends (on paper only) east-west through the site. The existing APNs subject to the proposed changes are: 317-120-021, 317-130-048, 317-130-025, 317-130-017, and 317-130-021.

IV. REQUIRED PERMITS/ACTIONS

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Perris, as the Lead Agency, is charged with the responsibility of deciding whether to approve the Project. As identified above, the following approvals and permits are required from the City of Perris to implement the Project:

- **Certification of the EIR** with the determination that the EIR was prepared in compliance with the requirements of CEQA
- **CUP** for the retail uses
- **DPR** for the industrial use site plan and building elevations
- **TPM No. 38292** to create eight parcels for the proposed retail and industrial uses, and to vacate Dawes Street.
- **PVCCSP Amendment** to change the existing PVCCSP land use designation for the industrial component of the Project from Business Professional Office and Commercial Light industrial.

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the Project include:

- Review and approval of all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review all on-site plans, including grading and on-site utilities; and
- Approval of a Final Water Quality Management Plans to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies include:

- **Regional Water Quality Control Board.** A National Pollutant Discharge Elimination System (NPDES) permit to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened.
- **Riverside County Flood Control & Water Conservation District.** Approval of storm drain plans for public storm drain.
- **Eastern Municipal Water District.** Approval of Water Supply Assessment and water and sewer improvement plans.
- **South Coast Air Quality Management District (SCAQMD).** Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants.
- **Other Utility Agencies.** Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

V. PROBABLE ENVIRONMENTAL EFFECTS OF THE PROJECT

The PVCCSP EIR is a program EIR, and project-specific evaluations in a later-tier environmental documents for individual development projects within the Specific Plan area was anticipated. As stated in Section 15168(d)(3) of the State CEQA Guidelines, “The program EIR can focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before”. As such, the environmental analysis for the Project will incorporate the information and analysis presented in the PVCCSP EIR, when applicable.

The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the EIR. In conjunction with certification of the PVCCSP EIR, the City of Perris also adopted a Mitigation Monitoring and Reporting Program (MMRP). Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects in the Specific Plan area. The City of Perris requires that future development projects in the PVCCSP planning area comply with the required PVCCSP Standards and Guidelines and PVCCSP EIR mitigation measures as outlined in the MMRP and that these requirements are implemented in a timely manner. Relevant Standards and Guidelines and PVCCSP EIR mitigation measures that are incorporated into the Project will be listed for each topical issue in the EIR.

The Draft EIR for the Project will contain a detailed Project Description, a description of the existing environmental setting of the Project site and surrounding area, analysis of Project-specific environmental impacts, analysis of cumulative impacts, identification of additional Project-specific mitigation measures required to reduce potentially significant impacts, and an analysis of alternatives to the Project that could reduce one or more of the potentially significant impacts of the Project.

Based on currently available information, and as discussed below, the City has determined that the Project would have no impacts or less than significant impacts related to agricultural and forestry resources, mineral resources, population and housing, and wildfire. Therefore, no further analysis of these environmental topics will be provided in the Draft EIR.

- **Mineral Resources.** Figure OS-6, Mineral Resource Zones, of the Riverside County General Plan for the area shows that the Project site is located within Mineral Resource Zone 3 (MRZ-3). MRZ-3 represents areas where the available geologic information indicates that mineral deposits exist or are likely to exist; however, the significance of the deposit cannot be evaluated from available data (Riverside County, 2015). In addition, the California DOC does not show oil, gas, or geothermal fields underlying the site; and no oil or gas wells are recorded on or near the site in the Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder (DOC, 2021). No sites within the City of Perris City limits have been designated as locally important mineral resource recovery sites in the City of Perris General Plan or the Riverside County General Plan (City of Perris, 2005; Riverside County, 2015). Accordingly, no impact to the availability of a regionally or locally important mineral resource would occur. No impacts related to mineral resources would result from the Project.
- **Population and Housing.** The Project site is currently undeveloped and construction of the Project would not require the construction of replacement housing, and would not displace any existing housing or residents. The Project does not involve the development of residential uses and would not directly increase the resident population, but would create jobs and increase employment in the City of Perris. The extent to which the new jobs created by a Project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a Project. The Project would create short-term jobs during the construction phase. These short-term positions would be filled by workers who, for the most part, would already reside in the region; therefore, construction of the Project would not generate a substantial temporary or permanent increase in population within the Project area.

Table 4.8-E, Development Intensity and Employment Projections, of the PVCCSP EIR, identifies average employment generation factors for the allowed development types identified in the PVCCSP. One employee per 1,030 sf is estimated for Light Industrial floor space and one employee per 500 sf is estimated for commercial uses. The Project consists of the construction and operation of up to 950,224 sf of warehouse uses, and 37,215 sf of commercial retail uses.

Based on the employment generation factors in the PVCCSP EIR, the Project could generate approximately 923 new industrial employees and 74 new commercial retail employees (approximately 997 new jobs). The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area (see Table 4.8-E under Section 4.8, Land Use and Planning, and the discussion of “Growth Inducing Impacts” in Section 5 of the PVCCSP EIR). Therefore, the employment generation estimated for the Project (997 employees) represents approximately 1.8 percent of the total employment generation anticipated in the Specific Plan area. Further, this represents approximately 3.8 percent of the City’s projected employment base by 2045 as presented in the Southern California Association of Governments (SCAG) *Connect SoCal* (26,400 employees) (SCAG, 2020). Additionally, similar to the short-term construction jobs, it is anticipated that these new retail and warehouse positions would be filled by workers who would already reside in the region. The Project would involve the installation of utilities necessary to connect to existing infrastructure systems adjacent to or in the vicinity of the Project site and would involve improvements to adjacent roadways, consistent with the PVCCSP. Therefore, the Project would not directly or indirectly generate substantial unplanned population growth in the area.

- **Public Services.** The PVCCSP EIR Initial Study concluded that development within the PVCCSP area, which includes the Project site, would result in less than significant impacts to public services. The City of Perris has concluded that the Project would not result in potentially significant impacts to public services as discussed below.
 - **Fire Protection.** While implementation of the Project would not involve new residential uses or uses that would increase the City’s population, the operation of the proposed industrial and retail buildings would increase the demand for fire protection, prevention, and emergency medical services at the currently undeveloped site. California Department of Forestry and Fire Protection (CAL FIRE), under contract with Riverside County and operating as RCFD, provides fire prevention and suppression to the City of Perris. RCFD Station No. 1 located at 210 W. San Jacinto Avenue and RCFD Station No. 90 at 333 Placentia Avenue exclusively serve the City of Perris. RCFD Station No. 1 is approximately 7.2 roadway miles southeast of the Project site. RCFD Station No. 90 is approximately 2.6 roadway miles southeast of the Project site. Other RCFD stations respond to emergency service calls in the City on an as-needed basis. The Project would create the typical range of service calls for industrial and retail developments, such as medical aid, fire response, and traffic collisions. The Project would be designed in compliance with all applicable ordinances and standard conditions established by the RCFD and/or the City or State including, but not limited to those regarding fire prevention and suppression measures, such as fire hydrants, fire access, emergency exits, combustible construction, fire flow, and fire sprinkler systems. Compliance with applicable regulations would be confirmed by the RCFD during its review of development plans to ensure it has the capacity to provide proper fire protection to the development. The development of the Project would not cause fire staffing, facilities, or equipment to operate at a deficient level of service. Additionally, the Project Applicant would be required to pay North Perris Road and Bridge Benefit District (NPRBBD) fees, inclusive of the City’s Development Impact Fee (DIF), which provides a funding source for construction of fire facilities as a result of impacts related to future growth in the City. The Project would not require the construction of new or expanded fire protection facilities; therefore, no physical impacts would result and the impact would be less than significant.

- **Police Protection.** While implementation of the Project would not involve new residential uses or uses that would increase the City's population, the operation of proposed industrial and retail buildings would increase the demand for police protection services at the currently undeveloped site. The City of Perris contracts with the Riverside County Sheriff Department (RCSD) for the provision of municipal police services in the City. The Project would be designed and operated in compliance with the standards provided within the City's Municipal Code, RCSD, and the PVCCSP for new development in regards to public safety. The Perris Police Station is located at 137 N. Perris Boulevard and is located approximately 4.2 roadway miles southeast of the Project site. Sheriff response times vary by time of day and priority of the call. Typical operational police protection services involved with the proposed industrial and retail uses include after-hours patrol, crime and traffic accident/collision responses, and calls for service. The Project Applicant would be required to contribute DIF fees which would ensure the Project provides fair share funds for the provision of additional police protection services, which may be applied to sheriff facilities and/or equipment, to offset the incremental increase in the demand that would be created by the Project. Therefore, Project's incremental demand for sheriff protection services would be less than significant with the Project's mandatory payment of DIF fees. The Project would not require the construction of new or expanded police protection facilities; therefore, no physical impacts would result and the impact would be less than significant.
- **Schools.** The Project site is located with the Val Verde Unified School District (VVUSD), which covers 67 square miles in Riverside County, and is comprised of 21 schools serving pre-kindergarten through 12th grade (VVUSD, 2020). The Project site is within the service area for the following schools: Val Verde Elementary School (Elementary school serving 6th Grade), Lakeside Middle School, Rancho Verde High School, and Val Verde High School (located adjacent to and south of the Project site). The Project would not directly create a source of students, as the Project does not involve the development of residential land uses. Therefore, no school-age children would be living at the Project, and no direct demand for school services and facilities would occur. Additionally, as previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. Appropriate developer impact fees, as required by State law, shall be assessed and paid by the Project Applicant to the VVUSD. Section 65995(b) of the *California Government Code* establishes the base amount of allowed developer fees and allows increases in the base fee every two years. School districts are placed into a specific "level" based on school impact fee amounts that are imposed on the development. With the payment of the required fees and with no additional students generated from the Project, no significant impacts to school services would result. The Project would not require the construction of new or expanded police protection facilities; therefore, no physical impacts would result and the impact would be less than significant.
- **Parks.** The City of Perris Community Services Department provides community services and recreational and leisure time opportunities and is responsible for the planning, development, and maintenance of the City's parks and recreational facilities. The Project area currently does not contain any parkland or recreational facilities. The nearest park is Paragon Park, located approximately 1.8 miles southeast, and includes the following amenities: basketball court, fitness equipment, parking lot, picnic tables, playground, restrooms, sheltered picnic tables, and skate park (City of Perris, 2021). The Project does not propose the development of any type of residential land use or other use that would result in a direct increase in the City's population or demand for park services. The

Project would not require the construction of new or expanded park facilities; therefore, no physical impacts would result and the impact would be less than significant.

- **Other Public Facilities.** Residents of the City of Perris are provided library services through the Riverside County Library System (RCLS). As identified in the PVCCSP EIR Initial Study, development of allowed uses under the PVCCSP, including industrial and retail uses proposed as part of the Project, would not directly increase the demand for library or other public services as no new residential uses would be developed and no direct increase in the resident population would result that may create a demand for library services. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. The Project would not require the construction of new or expanded library facilities; therefore, no physical impacts would result and the impact would be less than significant.
- **Recreation.** The City's Community Services Department is responsible for recreational facilities in the City. As required by Section 8.2 of the PVCCSP, the Project would provide onsite employee amenities. The Project would not require the construction or expansion of public recreational facilities or result in or accelerate the physical deterioration of existing neighborhood and regional parks or recreational facilities. This is because the Project does not involve the development of residential uses, and the proposed industrial and retail uses would not create an increase in the use of such facilities. The Project would not require the construction of new or expanded recreational facilities; therefore, no physical impacts would result.
- **Wildfire.** According to Exhibit S-16, Wildfire Constraint Areas, of the City General Plan Safety Element, the Project site is not located in or near an area identified as being a "Wildfire Hazard Area" (Perris, 2016). Additionally, according to the California Department of Forestry and Fire Protection's (CAL FIRE) Fire and Resources Assessment Program (FRAP), the Project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CalFire, 2021). The Project site is located within the limits of the City of Perris, and is therefore not within a State Responsibility Area (SRA), which is the land where the State of California is financially responsible for the prevention and suppression of wildfires. Therefore, the Project would have no impacts related to wildfires.

The analysis to be provided in the forthcoming Draft EIR, and the supporting technical studies to be included in the Draft EIR, will address the following environmental topics due to the potential for significant impacts, and mitigation measures will be identified, if necessary:

- **Aesthetics.** The Project, which is in a developing area, would alter the existing visual character of the Project site and would introduce new sources of light during construction and operation. The Draft EIR will evaluate the potential for the Project to have an adverse effect on a scenic vista, to degrade the visual character of the area character, and to create potential light and glare impacts. The Project site is not within a State scenic highway, which will also be discussed in the Draft EIR.
- **Agriculture and Forestry Resources.** Pursuant to CEQA Section 21060.1, agricultural land means Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, as defined by the U.S. Department of Agriculture land inventory and monitoring criteria as modified for California. The State CEQA Guidelines Appendix G thresholds of significance used by the City of Perris for CEQA purposes states that a significant impact to agriculture could occur if a project was to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance

(Farmland) to non-agricultural use. Based on the California Department of Conservation's (DOC's) 2018 Farmland Mapping and Monitoring Program (FMMP), the Project site includes Farmland of Local Importance, and is surrounded by areas also designated as Farmland of Local Importance or Urban and Built-Up Land (DOC, 2018). The Project site and surrounding areas are not currently being utilized for agricultural purposes. Moreover, the Project site is not within an area subject to the California Land Conservation Act of 1965 (Williamson Act), is not zoned for agricultural or forestry uses, and does not include forestry resources. Accordingly, no impacts related to agricultural or forestry resources would result from the Project. Notwithstanding, potential impacts to agricultural resources will be addressed in the Draft EIR.

- **Air Quality.** The Project area is in the South Coast Air Basin (Basin). Air quality in the Basin is administered by the South Coast Air Quality Management District. Impacts related to the following topics will be addressed in the forthcoming Draft EIR: consistency with the Air Quality Management Plan for the Basin; the potential for a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under applicable air quality standards; the potential exposure of sensitive receptors to substantial pollutant concentrations, including mobile source health risk impacts; and potential for the other emissions (such as those leading to odors adversely affecting a substantial number of people).
- **Biological Resources.** As previously identified, the Project area is within the Western Riverside County MSHCP area. The Draft EIR will identify existing biological resources at the Project site and will address potential impacts to sensitive species, sensitive natural communities, riparian habitat and protected wetlands; and, wildlife movement. The Project's consistency with the City's Urban Forestry Ordinance (Ordinance 1262), and the Western Riverside County MSHCP will also be addressed in the Draft EIR.
- **Cultural Resources.** During construction of the Project, ground-disturbing activities could encounter previously unknown historical or archaeological resources, or human remains. Potential impacts to cultural resources will be addressed in the Draft EIR.
- **Energy.** The Project will consume energy resources during construction and operation. The Draft EIR will address the potential for the Project to result in the wasteful, inefficient, or unnecessary consumption of energy resources, and whether the Project would conflict with state or local plans for renewable energy or energy efficiency.
- **Geology and Soils.** The Draft EIR will address the geological, soil, and seismic hazards having the potential to impact the Project and Project occupants. The Project site is in an area with high paleontological sensitivity, and the potential to impact paleontological resources will be addressed in the Draft EIR.
- **Greenhouse Gas Emissions.** The potential for the Project to generate greenhouse gas (GHG) emissions during construction and operation, either directly or indirectly, that may have a significant impact on the environment will be addressed in the Draft EIR. Furthermore, the Draft EIR will include an evaluation of consistency of the Project with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs.
- **Hazards and Hazardous Materials.** The Draft EIR will address potential hazards during construction and operation of the Project, and the potential for exposure of construction workers and Project occupants to hazardous materials. The Project site is immediately north of Val Verde High School and potential impacts to the school resulting from the handling of hazardous

materials will be addressed in the Draft EIR. The Draft EIR will evaluate the potential safety and noise impacts related to the Project's proximity to the MARB/IPA and consistency with applicable provisions of the MARB/IPA ALUCP. The potential to impair or interfere with an adopted emergency response plan will also be addressed. As identified previously, the Project area is not in a wildfire hazard area; therefore, no further analysis of the potential for wildland fires will be provided in the Draft EIR.

- **Hydrology and Water Quality.** The Draft EIR will address the potential for the Project to violate water quality standards and to degrade water quality during construction and operation. Project features included in the Project-specific Preliminary Water Quality Management Plan (WQMP) to treat and/or limit the entry of contaminants into the storm drain system will be identified in the Draft EIR. The Project would increase the amount of impervious surface on the Project site. Changes to the drainage patterns will be identified in the Draft EIR and potential impacts from these changes related to erosion and siltation, the amount and rate of storm water runoff, flooding and impeding flood flows, and storm drain capacity will be addressed. The Draft EIR will also address the potential for release of pollutants from Project inundation, and the Project's consistency with the applicable water quality control plan and sustainable groundwater management plan.
- **Land Use and Planning.** The Project would involve the construction and operation of industrial and retail uses. The consistency of the Project with applicable General Plan goals and policies, the PVCCSP, and zoning will be addressed in the Draft EIR. Analysis of the Project's consistency with applicable provisions of the MARB/IPA ALUCP, and SCAG's regional planning programs will also be provided. The Project would not divide an established community, which will be addressed in the Draft EIR.
- **Noise.** The Draft EIR will address the potential for construction-related and operational (stationary and mobile) noise increases to exceed applicable established noise standards, and the potential for vibration during construction and operation. The potential for exposure of Project occupants to noise from the MARB/IPA will also be addressed.
- **Transportation.** The Draft EIR will address the potential for the Project to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The Project's consistency with CEQA Guidelines Section 15064.3(b), which requires that traffic impacts be measured based on vehicles miles traveled (VMT) will also be analyzed in the Draft EIR, in compliance with the City's Transportation Impact Analysis Guidelines (TIA Guidelines) adopted in June 2021. The potential for the Project to increase hazards due to geometric design, and to result in inadequate emergency access will also be addressed in the Draft EIR.
- **Tribal Cultural Resources.** The Draft EIR will discuss impacts related to tribal cultural resources directly related to California Native American tribes that populated the area where the Project area is geographically located. The Draft EIR will also discuss the results of Native American consultation activities conducted by the City, as required by Assembly Bill (AB) 52.
- **Utilities and Service Systems.** The Project involves the installation of utility infrastructure needed to serve the Project (e.g., water, sewer, storm drains, electric, natural gas, telecommunications). The physical environmental impacts resulting from the installation of utility infrastructure on- and off-site will be addressed in the Draft EIR. The Draft EIR will present the results of a Water Supply Assessment to be conducted by the EMWD, and will address the capacity of the EMWD's water treatment facilities. The solid waste generation from

the Project during construction and operation will be estimated, and the Draft EIR will address the capacity of the local infrastructure for solid waste management, and whether the Project would comply with solid waste management regulations.

VI. FUTURE PUBLIC MEETINGS

As identified previously, the City of Perris will conduct a Draft EIR scoping meeting on April 20, 2022, during the regularly scheduled Planning Commission meeting. At the meeting, the City will provide background information on environmental impact reports, provide a brief overview of the Project and will solicit public input on environmental issues to be addressed in the Draft EIR and on items of public concern. Issues identified during the scoping meeting will be addressed in the Draft EIR (as appropriate).

VII. RESPONSE TO THIS NOTICE OF PREPARATION

Please provide written comments no later than 30 days from receipt of this Notice of Preparation. According to Section 15082(b) of the State CEQA Guidelines, your comments should address the scope and content of environmental information related to your agency's area of statutory responsibility. More specifically, your response should identify the significant environmental issues and reasonable alternatives and mitigation measures that your agency will need to have explored in the Draft EIR; and, whether your agency will be a responsible agency or a trustee agency, as defined by CEQA Code Sections 15381 and 15386, respectively. Please return all comments to the following address:

Mathew Evans, Project Planner
City of Perris Planning Division
135 North "D" Street
Perris, California 92570
Email: mevans@cityofperris.org
(951) 943-5003 ext. 115

The City of Perris appreciates your conscientious attention to this Notice of Preparation.

VIII. DOCUMENTS INCORPORATED BY REFERENCE AND REFERENCES

The following reports and/or studies are applicable to development of the Project site and are hereby incorporated by reference. The reports are available for review at the City of Perris Planning Division at the address above.

- *Perris General Plan 2030 Environmental Impact Report*, SCH No. 2004031135, certified April 26, 2005 (City of Perris, 2005)
- *Perris Valley Commerce Center Specific Plan*, adopted January 10, 2012 and amended through January 2022 (Amendment No. 12) (City of Perris, 2021b)
- *Perris Valley Commerce Center Final Environmental Impact Report*, SCH No. 2009081086, certified January 10, 2012 (City of Perris, 2011)

The following supporting documentation was used in preparing this NOP:

California Department of Conservation (DOC), Division of Oil, Gas, and Geothermal Resources (DOGGR). 2021 (May 4, access date). Division of Oil, Gas, and Geothermal Resources Well Finder. Sacramento, CA: DOC DOGGR.
<https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.35333/33.95744/11>

California DOC, Farmland Mapping and Monitoring Program (FMMP). 2018. California Important Farmland Finder. Sacramento, CA: FMMP. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

California Department of Forestry and Fire Protection (CalFire). 2021. Fire Hazard Severity Zone Viewer. Sacramento, CA: CalFire. <https://egis.fire.ca.gov/FHSZ/>.

Perris, City of. 2005 (April, approved). Comprehensive General Plan 2030. Perris, CA: the City. <http://www.cityofperris.org/city-hall/general-plan.html>.

———. 2011 (July, certified). Perris Valley Commerce Center Specific Plan Environmental Impact Report. Perris, CA: the City. <https://www.cityofperris.org/departments/development-services/specific-plans>

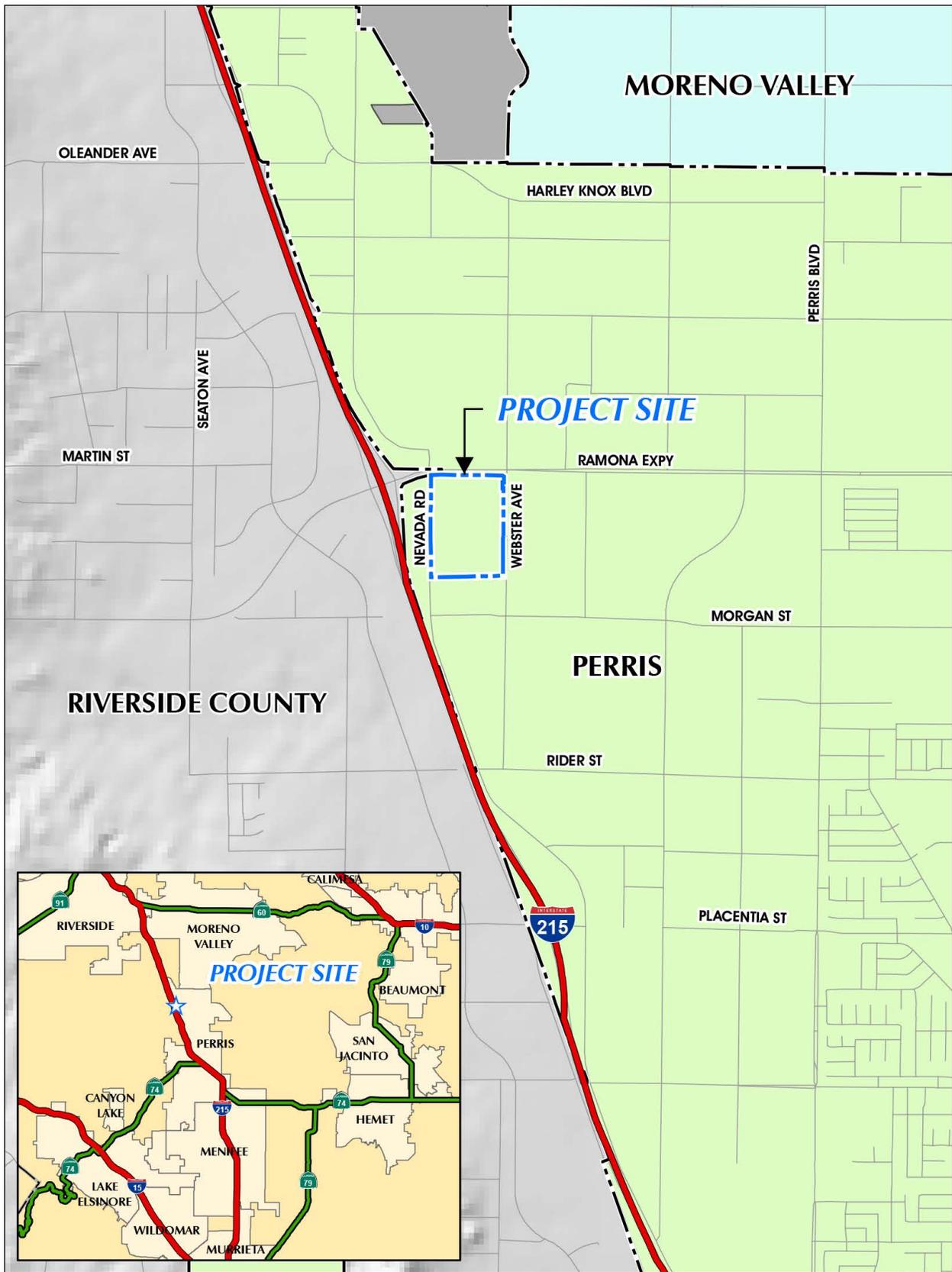
———. 2016 (August 30). General Plan Safety Element. Perris, CA: The City. http://www.cityofperris.org/city-hall/general-plan/Safety_Element.pdf.

———. 2021a (May 4, access date). CommunityView™. Perris, CA. The City. <http://maps.digitalmapcentral.com/production/vecommunityview/cities/perris/index.aspx#>

———. 2021b (September, amended). Perris Valley Commerce Center Specific Plan Amendment No. 10. Perris, CA: The City. <https://www.cityofperris.org/home/showpublisheddocument/2647/637672237415470000>

Riverside, County of. 2015 (December 8). County of Riverside General Plan: Multipurpose Open Space Element. Riverside, California: the County. https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch05_MOSE_120815.pdf?ver=2017-10-11-102103-833.

Southern California Association of Governments. (SCAG). 2020. Connect SoCal Demographics Growth Forecast Appendix. Profile of the City of Perris. Los Angeles, CA: SCAG. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579



Source(s): ESRI, RCTLMA (2021)

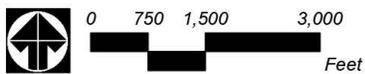
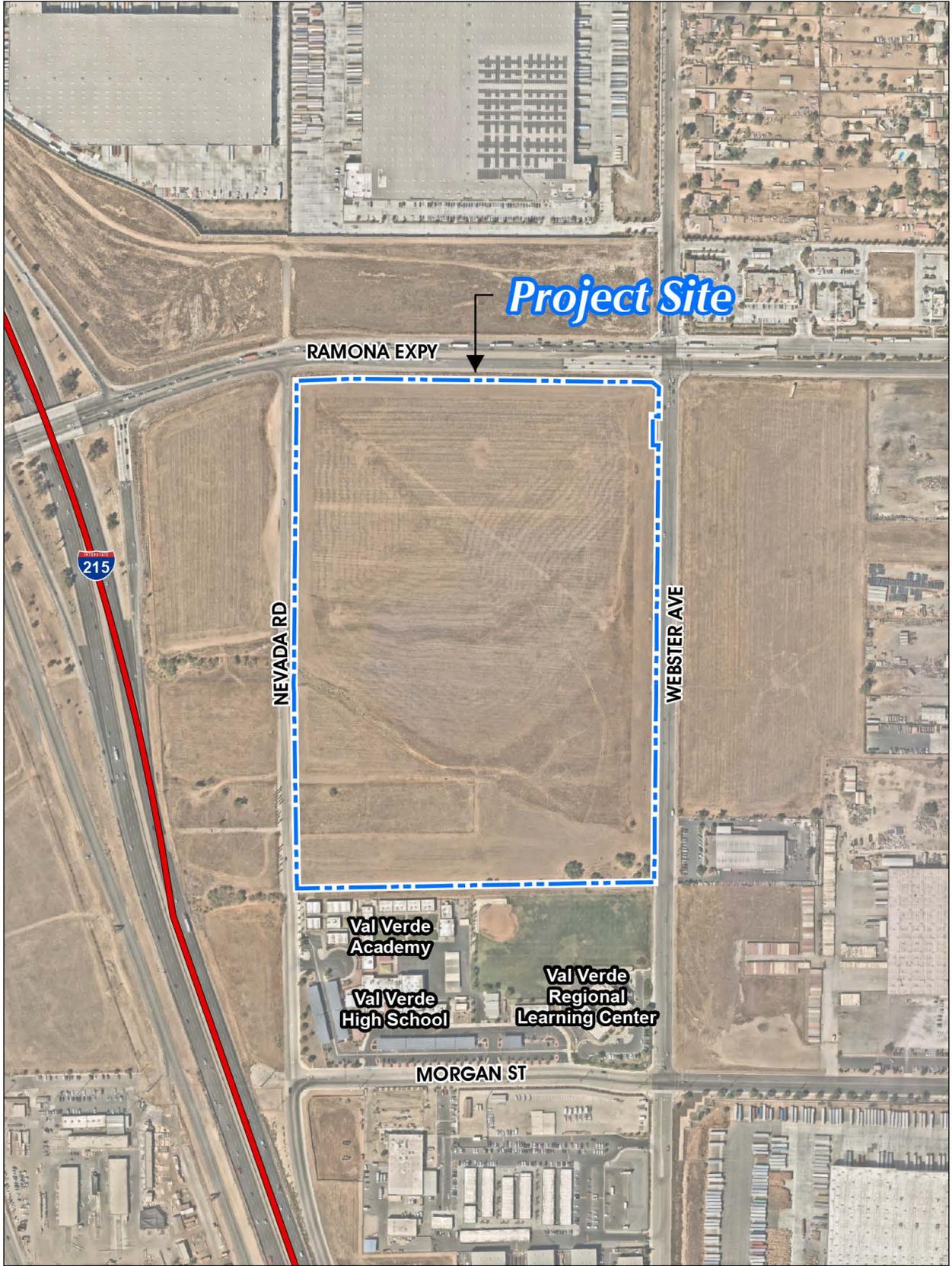


Figure 1

Project Location



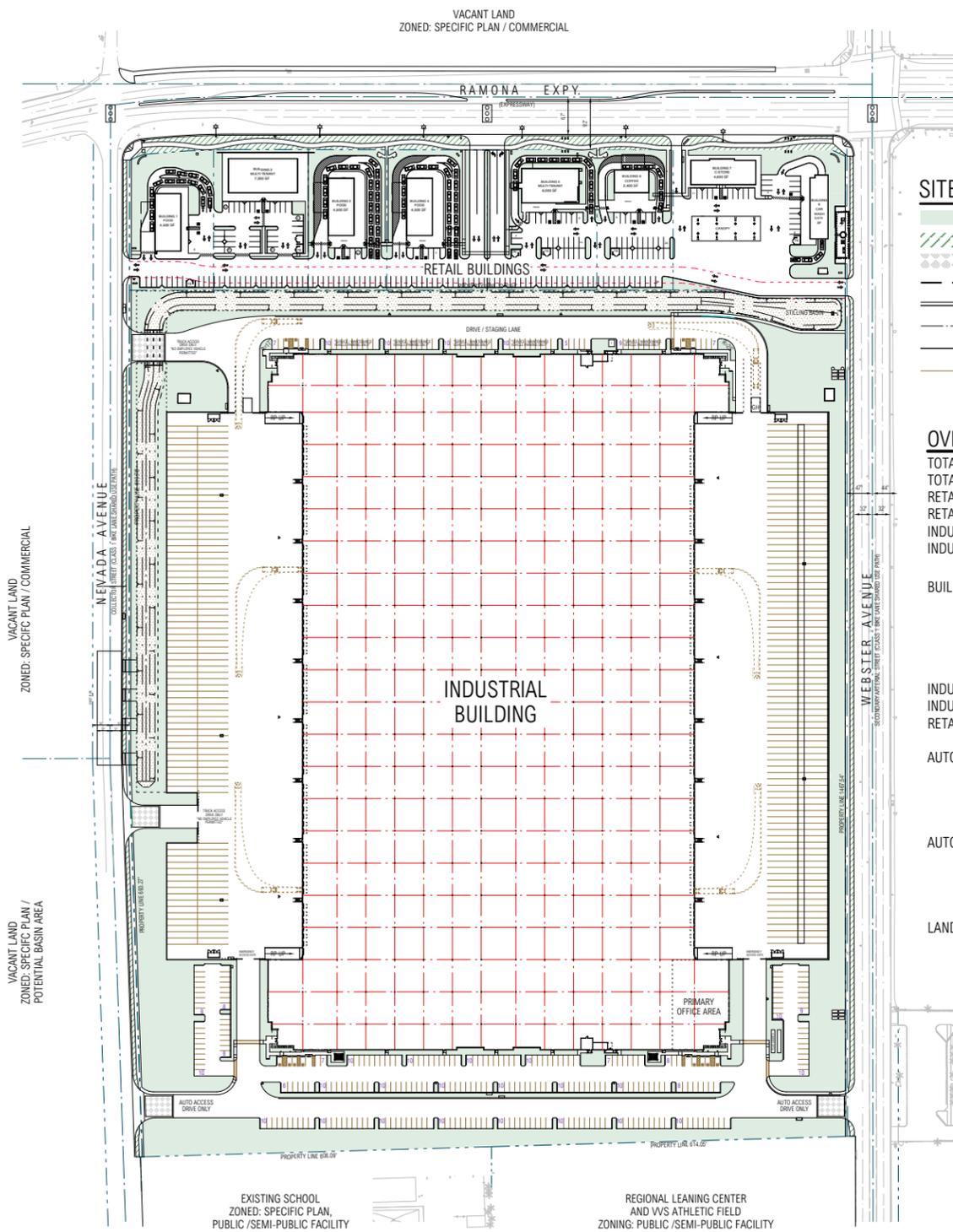
Source(s): ESRI, Nearmap Aerial (2021), RCTLMA (2021)

Figure 2



Aerial Photograph

PROPOSED SITE PLAN



SITE LEGEND:

- ON-SITE LANDSCAPED AREA
- OFF-SITE LANDSCAPED AREA
- DECORATIVE AUTO / TRUCK DRIVEWAYS
- SITE PROPERTY LINES
- CITY CURB AND GUTTER LINES
- STREET CENTERLINES
- ON-SITE CURB LINES
- ON-SITE PARKING AND TRAILER STRIPPING

OVERALL PROJECT AREA

TOTAL GROSS SITE AREA:	2,176,883 SF / 49.97 AC
TOTAL STREET DEDICATION SITE AREA:	35,238 SF / .80 AC
RETAIL GROSS SITE AREA:	329,012 SF / 7.55 AC
RETAIL NET SITE AREA:	302,667 SF / 6.95 AC
INDUSTRIAL GROSS SITE AREA:	1,847,873 SF / 42.42 AC
INDUSTRIAL NET SITE AREA:	1,838,978 SF / 42.22 AC

BUILDING AREA:	
INDUSTRIAL FOOTPRINT	850,224 SF
INDUSTRIAL MEZZANINE	100,000 SF
RETAIL DEVELOPMENT	37,215 SF
TOTAL	987,439 SF

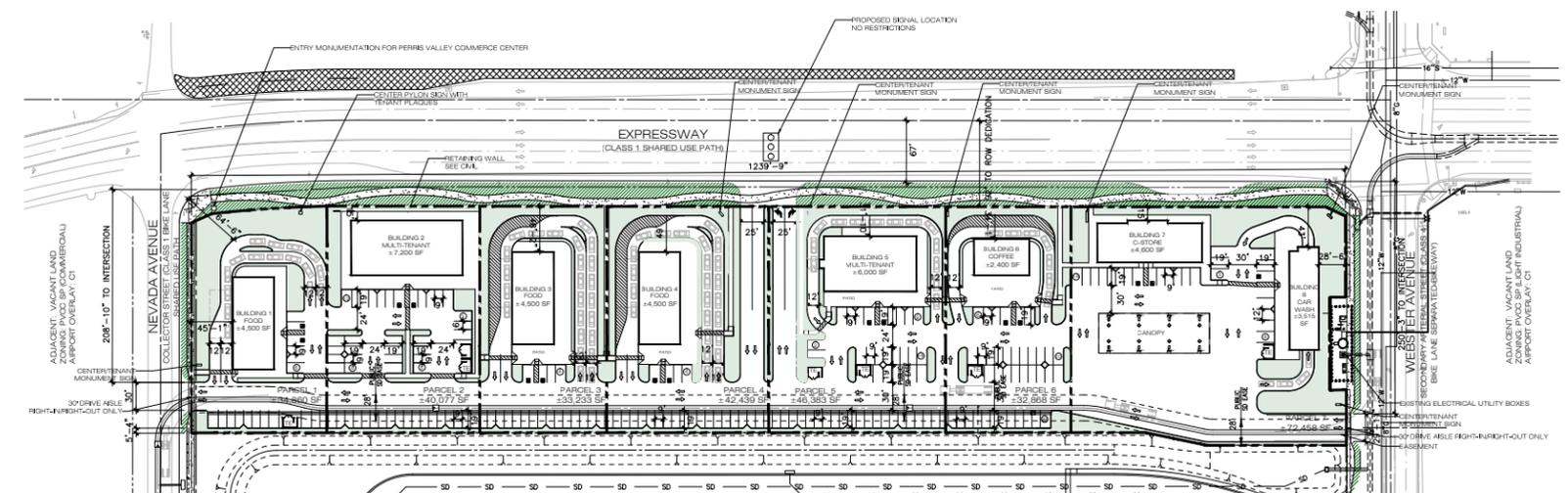
INDUSTRIAL LOT COVERAGE: (50% MAX)	46.46 %
INDUSTRIAL FAR COVERAGE:	51.67 %
RETAIL LOT COVERAGE:	12.29 %

AUTO PARKING REQUIRED:	
INDUSTRIAL REQUIRED STALLS	212 STALLS
RETAIL REQUIRED STALLS	187 STALLS
TOTAL REQUIRED STALLS	399 STALLS

AUTO PARKING PROVIDED	
INDUSTRIAL PROVIDED STALLS	348 STALLS
RETAIL PROVIDED STALLS	220 STALLS
TOTAL PROVIDED STALLS	568 STALLS

LANDSCAPE PROVIDED:	
INDUSTRIAL LANDSCAPE	236,011 SF / 13.00 %
RETAIL LANDSCAPE	54,291 SF / 18.00 %
TOTAL LANDSCAPE	290,302 SF / 13.54 %

ALTERNATE RETAIL ACCESS SITE PLAN



Source(s): RGA (March 2022), Bickel Group Architecture (01-31-2022)

Figure 3



Conceptual Site Plan

April 27, 2022

Mathew Evans
Project Planner
Planning Division
City of Perris
135 North "D" Street
Perris, California 92570
jmevans@cityofperris.org

Governor's Office of Planning & Research

Apr 28 2022

STATE CLEARINGHOUSE

Dear Mathew Evans:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Ramona Gateway Commerce Center (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2022040023. The Project proposes the development of a 950,224 square foot warehouse building and 37,215 square feet of retail uses. The Project site is located within the City of Perris (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Industrial development, such as the proposed Project, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.¹ The Project will expose nearby communities to elevated levels of air pollution. Residences are located north of the Project with the closest residence located approximately 570 feet from the Project's northern boundary. In addition to residences, Val Verde High School is located within 50 feet of the Project's southern boundary. These communities are surrounded by existing toxic diesel PM emission sources, which include heavy-duty truck traffic serving existing industrial buildings, and vehicular traffic along Interstate 215 (I-215). Due to the Project's proximity to residences and schools already burdened by multiple sources of air pollution, CARB is concerned with the potential cumulative health impacts associated with the construction and operation of the Project. CARB has reviewed the NOP and is concerned about the air pollution and health risk impacts that would result from the proposed Project.

1. With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Operation

Since the Project is near residences and a school, the City and applicant must prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy-duty trucks. The HRA should also determine if the operation of the Project in conjunction with past, present, and reasonably foreseeable future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, the City and applicant should include all applicable air pollution reduction measures listed in Attachment A of this letter.

Since five percent of the proposed warehouse space would be used for cold storage, trucks and trailers visiting the Project-site would be equipped with Transport Refrigeration Units (TRUs).² TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project-site. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating would be exposed to diesel exhaust emissions that would result in a significant cancer risk impact to the nearby community. The City must model air pollutant emissions from on-site TRUs in the DEIR, as well as include potential cancer risks from on-site TRUs in the Project's HRA.

The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),³ and CARB's Hot Spots Analysis and Reporting Program (HARP2 model). The Project's mobile diesel PM emissions used to estimate the Project's cancer risk impacts should be based on CARB's latest 2021 Emission Factors model (EMFAC2021). Mobile emission factors can be easily obtained by running the EMFAC2021 Web Database: <https://arb.ca.gov/emfac/>.

The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and planners will have a complete understanding of the potential health impacts that would result from the Project.

2. TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

3. Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Construction

In addition to the health risks associated with operational diesel PM emissions, health risks associated with construction diesel PM emissions should also be included in the air quality section of the DEIR and the Project's HRA. Construction of the Project would result in short-term diesel PM emissions from the use of both on-road and off-road diesel equipment. The OEHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project-site during construction.

The HRA should account for all diesel PM emission sources related to Project construction, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks. As previously stated in Section I of this letter, the cancer risks evaluated in the construction HRA should be based on the latest OEHHA guidance, and CARB's HARP2 model. The cancer risks reported in the HRA should be calculated using the latest emission factors obtained from CARB's latest EMFAC (currently EMFAC 2021) and off-road models.

Conclusion

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and NO_x emissions, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to implement the applicable measures listed in Attachment A of this letter.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at stanley.armstrong@arb.ca.gov.

Sincerely,



Robert Krieger, Branch Chief, Risk Reduction Branch

Attachment

cc: State Clearinghouse
state.clearinghouse@opr.ca.gov

Yassi Kavezade, Organizer, Sierra Club
yassi.kavezade@sierraclub.org

Lijin Sun, Program Supervisor, CEQA Intergovernmental Review, South Coast Air Quality Management District
lsun@aqmd.gov

Morgan Capilla, NEPA Reviewer, U.S. Environmental Protection Agency, Air Division, Region 9
capilla.morgan@epa.gov

Taylor Thomas, Research and Policy Analyst, East Yard Communities for Environmental Justice
tbthomas@eycej.org

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

Attachment A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.
4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be model

year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NO_x) standard starting in the year 2022.¹

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRUs) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.²
3. Include contractual language in tenant lease agreements that requires all TRUs entering the project-site be plug-in capable.
4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
5. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).³
6. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2023. A list of commercially available zero-emission trucks can be obtained from the Hybrid

1. In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NO_x emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards>

2. CARB's technology assessment for transport refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf

3. Clean Off-Road Equipment Voucher Incentive Project. Accessible at: <https://californiacore.org/how-to-participate/>

and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).⁴ Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.⁵

7. Include contractual language in tenant lease agreements that requires the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,⁶ Advanced Clean Trucks Regulation,⁷ Periodic Smoke Inspection Program (PSIP),⁸ and the Statewide Truck and Bus Regulation.⁹
8. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
9. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.
10. Include contractual language in tenant lease agreements, requiring the installing of vegetative walls¹⁰ or other effective barriers that separate loading docks and people living or working nearby.
11. Include contractual language in tenant lease agreements, requiring all emergency generators to be powered by a non-diesel fuel.
12. The project should be constructed to meet CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking, and achieve a certification of compliance with LEED green building standards.

4. Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: <https://californiahvip.org/>

5. Carl Moyer Program and Voucher Incentive Program. <https://ww2.arb.ca.gov/carl-moyer-program-apply>

6. In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://ww2.arb.ca.gov/our-work/programs/ttghg>

7. On June 25, 2020, CARB approved the Advanced Clean Trucks Regulation. The regulation requires manufacturers to start the transition from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 electric trucks in California by the end of 2030 and about 300,000 by 2035. CARB is expected to consider a fleet regulation in 2021 that would be compatible with the Advanced Clean Trucks regulation, requiring fleets to purchase a certain percentage of zero-emission trucks and vans for their fleet operations. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>

8. The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: <https://www.arb.ca.gov/enf/hdvp/hdvp.htm>

9. The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>

10. Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/13-306.pdf>

NATIVE AMERICAN HERITAGE COMMISSION

Governor's Office of Planning & Research

April 14, 2022

Apr 15 2022

Matthew Evans, Project Planner
City of Perris
135 North D Street
Perris, CA 92570

STATE CLEARINGHOUSE

Re: 2022040023, Ramona Gateway Commerce Center Project, Riverside County

Dear Mr. Evans:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).
 - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project's impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

From: Robertson, Glenn@Waterboards <Glenn.Robertson@waterboards.ca.gov>

Sent: Wednesday, March 30, 2022 11:39 PM

To: Mathew Evans <mevans@cityofperris.org>

Cc: Freshwater, Jason@Waterboards <Jason.Freshwater@Waterboards.ca.gov>; Reeder, Terri@Waterboards <Terri.Reeder@waterboards.ca.gov>; Tenorio, Claudia@Waterboards <Claudia.Tenorio@Waterboards.ca.gov>; Robertson, Glenn@Waterboards <Glenn.Robertson@waterboards.ca.gov>

Subject: Notice of Preparation for Ramona Gateway Commerce Center Project, Perris

Mathew Evans, Project Planner
City of Perris Planning Division
135 North D Street
Perris, CA 92570

Re: Notice of Preparation for a Draft Environmental Impact Report, for the Ramona Gateway Commerce Center Project

To Mathew Evans:

I am Glenn Robertson, CEQA Coordinator for the Santa Ana Regional Water Quality Control Board (Santa Ana Water Board), with our thanks for your Notice of Preparation (NOP) issued for a Draft Environmental Impact Report (DEIR) for the proposed Ramona Gateway Commerce Center Project. Please accept these email comments as our office's official comments on the NOP, and we may issue a formal letter at the DEIR stage. The Project is located in Perris in a rectangular parcel (site) east of Interstate 215, between Nevada and Webster Avenues south of Ramona Expressway. Our comments are consistent with the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan):

The first section of the NOP, "Project Site Location and Setting," describes stormwater run-on to the central portion of the site, from a culvert to the west. The culvert conveys stormflow, from Interstate 215 and points west of Interstate 215, across a parcel located west of Nevada Avenue and the site. In that parcel, the culvert has historically supported riparian vegetation (Warm Freshwater beneficial use established in the Basin Plan). From the culvert, stormwater flows east beneath Nevada Avenue and spreads out across the site through two slightly incised ephemeral channels. We note that flows tend to spread as a swale or wet meadow toward Webster Avenue, although we concur with the NOP description that the flows would tend to infiltrate before reaching Webster Avenue. However, it is stated that because flows do not continue offsite, these ephemeral channels are not jurisdictional to the Regional Board. Please have the DEIR state that these waters are indeed waters of the state for which the Santa Ana Water Board will accept jurisdiction. Also, please have a Jurisdictional Delineation conducted and discussed in the DEIR, determining the maximum seasonal wetted area of the ephemeral channels and the swale/wet meadow. Board staff will note this Project and likely respond to the DEIR after our further review of the need for Waste Discharge Requirements and mitigation measures to permit this Project's impacts to waters of the state.

We understand the thinking that the Project site is merely accepting run-on from the west which the Project would not generate, and that flows across the site have little continuity to "downstream waters." However, Santa Ana Water Board staff have had to scrutinize such run-on flows onto shallow soils, at sites in Perris, Mead Valley, Moreno Valley, and Menifee where these hydrologic features are common, to determine whether onsite waters of the state are substantial and warrant regulation. For

instance, the vegetated culvert leading to the Project site, on the parcel west of the Project site, would need to be under permit for whatever separate future impact arises from another project. Therefore, the continuance of that culvert's flows across the Project site may also need to come under permit. Santa Ana Water Board staff look forward to review of the proposed Jurisdictional Delineation.

Thank you for your consideration. Glenn S. Robertson



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

mevans@cityofperris.org

Mathew Evans, Project Planner
City of Perris, Planning Division
135 North D Street
Perris, California 92570

April 14, 2022

Notice of Preparation of a Draft Environmental Impact Report for the Ramona Gateway Commerce Center (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁷.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions⁸. According to the MATES V Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 426 in one million⁹. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁷ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁸ South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

⁹ South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v).

Reporting Plan for the 2016 Air Quality Management Plan¹⁰, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy¹¹.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule¹² and the Heavy-Duty Low NOx Omnibus Regulation¹³, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year¹⁴ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

¹⁰ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹¹ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsoocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹² CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹³ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹⁴ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NO_x) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of an 850,224-square-foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation¹⁵. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov.

¹⁵ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage¹⁶.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC220401-03

Control Number

¹⁶ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

JASON E. UHLEY
General Manager-Chief Engineer



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243546

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

May 2, 2022

Emailed this date to: mevans@cityofperris.org

Mr. Mathew Evans, Project Planner
City of Perris, Planning Division
135 North "D" Street
Perris, CA 92570

Dear Mr. Evans,

Re: Notice of Scoping Meeting and
Preparation of a Draft Environmental
Impact Report (DEIR) for the Ramona
Gateway Commerce Center Project

This email is written in response to the Notice of Preparation (NOP) and Scoping Meeting for the Ramona Gateway Commerce Center Project (Proposed Project). The Proposed Project is located south of Ramona Expressway, west of Webster Avenue, east of Nevada Avenue, and north of Val Verde High School, in the city of Perris. The City of Perris is the lead California Environmental Quality Act (CEQA) agency and will be preparing an Environmental Impact Report (EIR) for the Proposed Project. The Proposed Project consists of discretionary approvals and permits, including but not limited to: 1) a master Conditional Use Permit (CUP) for approximately 7.6 acres of retail development; 2) a Development Plan Review (DPR) for the construction and operation of an industrial warehouse facility on approximately 42.4 acres; 3) amendments to the Perris Valley Commerce Center Specific Plan (PVCCSP) to include a Light Commercial Industrial land use; and 4) approval of Tentative Parcel Map (TPM) No. 38292 to create eight parcels for retail and industrial land uses and to vacate a street.

The Riverside County Flood Control and Water Conservation District (District) has reviewed the NOP and has the following comments:

1. The Proposed Project is located within the District's Perris Valley Master Drainage Plan (MDP) boundaries. When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the MDP boundary of the most serious flooding problems and will provide adequate drainage outlets. The DEIR should address impacts to MDP facilities within the proposed project area. The MDP maps can be viewed online at <http://content.rcflood.org/MDPADP/>. Links to the MDP reports can be found by clicking on the individual MDPs within the webmap. To obtain additional information regarding the MDP and the proposed facilities, please contact Kyle Gallup of the District's Planning Section at 951.955.1345.

Mr. Mathew Evans

-2-

May 2, 2022

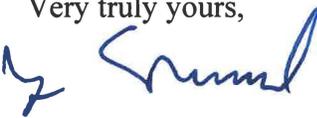
Re: Notice of Scoping Meeting and Preparation
of a Draft Environmental Impact Report (DEIR)
for the Ramona Gateway Commerce Center Project

2. Please note that if the Proposed Project incorporates storm drains 36 inches or larger in diameter the District would consider accepting ownership of such facilities on written request of the City. In order for the District to consider accepting ownership responsibilities for facilities constructed by others, a CEQA document containing an analysis of impacts related to construction and maintenance must be submitted and District plan check and inspection will be required to for District acceptance. Plan check, inspection, and administrative fees will be required. To obtain further information regarding the design requirements for the District to accept developer-built facilities, please contact Ruddy Argueta of the District's Plan Check Section at 951.955.1239.

Although not related to the analysis that would be contained in your CEQA document, it should be noted that this project is located within the limits of the District's Perris Valley Area Drainage Plan (ADP) for which drainage fees have been adopted; applicable fees should be paid by cashier's check or money order only to the District prior to issuance of grading permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit. ADP maps can be viewed online at: <http://content.rcflood.org/MDPADP/>. Links to the ADP reports can be found by clicking on the individual ADPs within the webmap. To obtain additional information on the ADP and the proposed facilities, please contact Kyle Gallup of the District's Planning Section at 951.955.1345.

Thank you for the opportunity to review the NOP. If you have any questions, please Michele Derry at 951.955.0276, or me at 951.955.1526.

Very truly yours,


for KEVIN CUNNINGHAM
Environmental Project Manager

cc: Albert Martinez
Kyle Gallup
Devraj Oza

MD:rlp

From: Vega, Jaqueline <JaVega@RIVCO.ORG>
Sent: Monday, April 04, 2022 11:25 AM
To: Mathew Evans <mevans@cityofperris.org>
Cc: Rull, Paul <PRull@RIVCO.ORG>
Subject: RE: Ramona Gateway Commerce Center Project

Hello Matthew,

Thank you for the quick turn around for those APNS.

Please note that the proposed project is located within zone C1 of March AIA, and review by ALUC is required because although the City of Perris is consistent with the March ALUCP, there is a legislative action being proposed. (SPA)

Please see attached application for your applicant

Should you have any questions, please contact me.

Jackie Vega
Urban Regional Planner I



Riverside County Airport Land Use Commission

4080 Lemon Street, 14th Floor

Riverside, Ca 92501

(951) 955-0982

Javega@RIVCO.ORG

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04/29/2022

VIA EMAIL ONLY

Mathew Evans, Project Planner
City of Perris Development Services Department
135 North "D" Street
Perris, CA 92570
Email: mevans@cityofperris.org

RE: NOP Comments for Ramona Gateway Commerce Center Project

Dear Mr. Evans,

On behalf of Californians Allied for a Responsible Economy ("CARE CA") thank you for the opportunity to provide comments on the Notice of Preparation ("NOP") for environmental review of the Ramona Gateway Commerce Center Project (the "Project"). The Project applicant is Perris Landco LLC.

The proposed Project consists of a 950,224 square foot Class A high-cube industrial warehouse building including 20,000 square feet of office space, as well as eight individual buildings with a combined 37,215 square feet of retail space. The Project requires approval for a Conditional Use Permit, Development Plan Review, Specific Plan Amendment, and Tentative Parcel map.

Since no Initial Study was prepared, the NOP identifies the Project's potentially significant impacts under CEQA to include all environmental considerations except Agricultural and Forestry Resources, Mineral Resources, Population and Housing, and Wildfire. The EIR will also incorporate the information and analysis presented in the PVCCSP EIR. CARE CA respectfully requests, under CEQA complete analysis of these impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives to the Project.

General Comments

1) Project Description: Although the tenant or planned operations are usually unknown at this stage of development, the DEIR should reflect a good faith effort at full disclosure by including as much information on the nature of operations as can be reasonably obtained. If the tenant for the Project is unknown, the DEIR must consider all reasonably foreseeable uses including higher intensity uses.

ii) Air Quality & Public Health: Given that the proposed project is adjacent to a high school, the DEIR must include a Health Risk Assessment (HRA) to assess the public health risks to students, faculty, and staff at the school. This is particularly important because of the adverse impact of logistics facilities on community health including carbon dioxide emissions caused by storage and material handling processes in warehouses.¹

The City should also consider taking the city of Fontana's lead to require large drought-tolerant trees to serve as a buffer between the high school and the massive industrial warehouse.

iii) Cold Storage Industrial Use: Since 5% of the proposed industrial warehouse would be operated as a cold storage warehouse, it is likely that trucks and trailers going in and out of the Project site would be equipped with transport refrigeration units (TRU). The TRUs would emit large quantities of diesel exhaust while operating within the Project site. Therefore, the City should model air pollutant emissions from on-site TRUs in the DEIR and include potential cancer risks to nearby sensitive receptors in the HRA.

iv) Utilities and Service Systems: Southern California Edison states that there is insufficient power to supply to industrial warehouses along a 15-mile stretch of the 215 freeway from March Air Reserve Base to Menifee². The Project is located along this area.

Therefore, the DEIR must analyze lack of sufficient electricity to power operations in the proposed warehouse, especially given that 5% of the building would be cold storage space.

v) Mitigation measures: Mitigation measures must be effective and enforceable. Every effort must be made to incorporate modern technology in the mitigation measures and MMRP. For example, a requirement to utilize natural refrigerant alternatives in the cold storage warehouse would reduce the Project's impact on greenhouse gas emissions (GHG). As more cold storage warehouses are built, the use of refrigerants with potent greenhouse gas emissions is growing, as is their contribution to global climate change.

Mitigation measures can also include requirements to install cool roofs to reduce operational energy demand, solar canopies on the parking lot south of the warehouse building, provision of EV charging infrastructure including electrification of loading docks, and solar roofs to generate energy for the industrial building.

¹ For example, <https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Storing-Harm.pdf>
https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf

² <https://therealdeal.com/la/2022/04/18/pol-says-power-shortage-threatens-inland-empires-industrial-development/>

III. Conclusion

Thank you for the opportunity to submit NOP comments. Again, CARE CA respectfully requests under CEQA full analysis of the environmental impacts, feasible mitigation, and reasonable alternatives to the Project.

We look forward to reviewing and commenting on the DEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski
Executive Director

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE
"Bringing People Together to Improve Our Social and Natural Environment"

April 28, 2022

City of Perris, Planning Division
Attn: Mathew Evans, Project Planner
135 North "D" Street
Perris, CA 92570

Submitted via email to mevans@cityofperris.org.

Re: Ramona Gateway Commerce Center Notice of Preparation (SCH #2022040023)

Dear Mr. Evans,

This letter is in response to the Notice of Preparation for the proposed Ramona Gateway Commerce Center ("Project") which would be built there in Perris. After reviewing the documents provided with the notice, we would like to offer these comments.

Air quality/GHG

In recent years, we have reviewed a number of projects which failed to meet the requirements of with the South Coast Air Quality Management District's Air Quality Management Plan. This is exacerbated by the fact that many of these communities are some of the worst in the state per CalEnviroScreen, including the one where the Project is which is in the upper third of all tracts. Thus, we would like to highlight the necessity for the EIR to establish how this Project would meet those requirements from the AQMP to ensure that it does not hinder progress in that regard.

Proximity to schools

The air quality concerns are heightened by the proximity of the Project to the Val Verde Academy, Val Verde High School, and Val Verde Regional Learning Center. It is already bad enough when the general public is exposed to toxic air but it is an even more urgent crisis when the people exposed are children because the pollution has an outsized impact on the developing bodies of children, leading to lifelong ailments and difficulties. We call for the EIR to fully account for how the Project would avoid raising the risk of illness for the population of children served in the schools adjacent the site.

Transportation

The description of this topic in the NOP appears to state that the preferred truck route would send them past the school sites to the interchange at Placentia Avenue which is an extremely problematic proposal. Instead, it would be ideal for trucks to use the Ramona Expressway interchange and access the site via traveling south on Webster Avenue for inbound trips while they would depart northbound on Nevada Avenue. That would limit the exposure of schoolchildren to the trucks and the pollution from being directly in front of their schools.

We would also strongly support the Alternate Retail Access Site Plan which would limit the driveways which open onto Ramona Expressway to be only a single one that is signalized. This is vital for providing safety and comfort to people not traveling in cars and we would like to see that

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

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metrics to ensure that the experience for those users (e.g. PLOS) be employed as part of the study for the Project.

Similarly, while it is encouraging to see that a Class I facility is planned, it is important for it to actually be functional, not just a pretty set of lines on drawings. Thus, we would call on the EIR to study making it at least 10 feet wide, provide it without the curves, and to design the driveways/intersections using the most competent and up-to-date designs, including the use of bike signals for the signalized driveway.

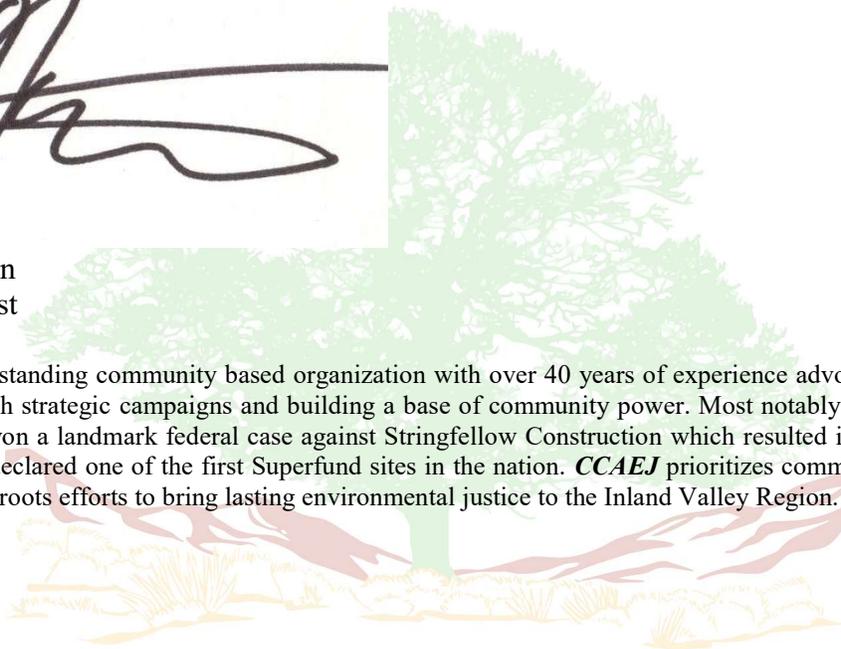
Thank you for the opportunity to provide these comments and we are here to answer any questions which may arise.

Sincerely,



Marven Norman
Policy Specialist

CCA EJ is a long-standing community based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, *CCA EJ*'s founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the 'Stringfellow Acid Pits' being declared one of the first Superfund sites in the nation. *CCA EJ* prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.



CCA EJ

